

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

JOANNE NEALE, KERI HAY, KELLY
MCGARY, SVEIN A. BERG,
GREGORY P. BURNS, DAVID TAFT,
JEFFREY KRUGER and KAREN
COLLOPY individually and on behalf of
others similarly situated,

Plaintiffs,

vs.

VOLVO CARS OF NORTH AMERICA,
LLC, and VOLVO CAR
CORPORATION,

Defendants.

No. 2:10-cv-04407-DMC-MF

CLASS ACTION

JURY TRIAL DEMANDED

**EXHIBIT A – CHART OF DOCUMENTS PLAINTIFFS’
SEEK TO HAVE SUBMITTED UNDER SEAL**

Document 1	Expert Report of Dr. Charles E. Benedict
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(C) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties’ agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal information.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants’ Objection to Seal?	No.

Document 2	Expert Report of V. Walter Bratic
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(c) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal documents.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.

Document 3	<p>Certification of Matthew D. Schelkopf (with below exhibits attached)</p> <ul style="list-style-type: none"> • <u>Exhibit 1</u>: Dep of Stefan Sandburg (May 22, 2012): • <u>Exhibit 2</u>: Dep of Stefan Persson (Jan. 10, 2012): • <u>Exhibit 3</u>: Dep of Andy McCloskey (Dec. 14, 2011): • <u>Exhibit 4</u>: Dep of Darren Bisaccia (Aprl 25, 2012): • <u>Exhibit 5</u>: Dep of Christopher Densely (Dec 15, 2011): • <u>Exhibit 6</u>: Documents Neale.VCC.0003856 Neale.VCC.0003858 Neale.VCC.0003893 Neale.VCC.0003915 Neale.VCC.0008125
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(c) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal documents.
(c)(2)(d) Unavailability of Less Restrictive Alternative	All aspects of this material are confidential.
Defendants' Objection to Seal?	No.

Document 4	Portions of Memorandum of Law in Support of Plaintiffs' Motion for Class Certification
	pg. 3 - beginning with "when" and ending with "traps"; pg. 3 – footnote 6; pg. 4 – beginning with "According" and ending with "sound"; pg. 5 – beginning with "plug" and ending with "sunroof."; pg. 7 – beginning with "At" and ending with "mid-"; pg. 8 – beginning with "2000s" and ending with "material." pg. 8 – footnote 18; pg. 9 – beginning with "In" and ending with "a" pg. 9 – footnote 21 beginning with "Another" and ending with "vehicle." pg. 10 – beginning with "widespread" and ending with "the"; pg. 10 – footnote 25 – beginning with "documents" and ending with sunroof."); pg. 10 – footnote 26 – beginning with "(Confirming" and ending with owner."); pg. 11 – beginning with "sunroof" and ending with "Rockleigh."; pg. 17 – beginning with "Specifically," and ending with "fraud"; pg. 18 – beginning with "claims" and ending with "Jersey."; pg. 25 – beginning with "Volvo" and ending with "alone.".
Disclosed to Public?	No. The parties agreed to keep this material confidential.
Subject to D.N.J. Confidentiality Order	Yes.
L.Civ.R. 5.3(c) factors	
(c)(2)(b) Public or Private Interests Protected	Protects the parties' agreement to keep this material confidential.
(c)(2)(c) Clearly Defined Serious Injury	Disclosure would divulge confidential Volvo internal documents.
(c)(2)(d) Unavailability of Less Restrictive Alternative	Portions of this material are confidential.
Defendants' Objection to Seal?	No.

Dated: August 7, 2012

Respectfully submitted,

By: //s// Joseph G. Sauder
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